

**EXCERPTS FROM THE DEPOSITION  
OF SAMUEL TELLER  
TAKEN AUGUST 11, 2021**

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION

4 In Re:

5 TESLA, INC. Civil Action No.  
6 SECURITIES LITIGATION 3:18-cv-04865-EMC

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8 \* \* \* C O N F I D E N T I A L \* \* \*

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10 CONFIDENTIAL REMOTE VIDEOTAPED DEPOSITION OF

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13 SAM TELLER

14

15 Roberts Creek, British Columbia

16 Wednesday, August 11, 2021

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22 Reported by:

23 THOMAS A. FERNICOLA, RPR

24 JOB NO. 198117

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Wednesday, August 11, 2021

9:00 a.m.

CONFIDENTIAL REMOTE VIDEO TAPED DEPOSITION of

9 SAM TELLER, held before Thomas A. Fernicola, a  
10 Registered Professional Reporter and Notary Public of  
11 the State of New York.

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1 A P P E A R A N C E S

2 (All Attendees Appearing Via Videoconference and/or  
3 Telephonically):

4

5 LEVI & KORSINSKY

6 Attorneys for Plaintiffs

7 1101 30th Street Northwest

8 Washington, DC 20007

9 BY: ELIZABETH TRIPODI, ESQ.

10 KATHY AMES, ESQ.

11

12

13 COOLEY

14 Attorneys for Tesla

15 3175 Hanover Street

16 Palo Alto, CA 94304

17 BY: PATRICK GIBBS, ESQ.

18 BINGXIN WU, ESQ.

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22 ALSO PRESENT:

23 MICHAEL BROWN, Videographer

24 CANDICE JACKMAN, In-House Counsel, Tesla.

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1                   THE VIDEOGRAPHER: Good morning.

2    My name is Michael Brown. I'm a Legal  
3    Videographer in association with TSG  
4    Reporting.

5                   Due to the severity of the  
6    COVID-19 pandemic and following the  
7    practice of social distancing, I will  
8    not be in the same room as the witness.  
9    Instead, I will be recording this  
10   videotaped deposition remotely.

11                  The reporter, Tom Farnicola, also  
12    will not be in the same room and will  
13    swear the witness remotely.

14                  Do all parties stipulate to the  
15    validity of this video recording and  
16    remote swearing, and that it will be  
17    admissible in the courtroom following  
18    Rule 30 of the Federal Rules of Civil  
19    Procedures and the state's rules where  
20    this case is pending?

21                  MS. TRIPODI: Good morning. My  
22    name is Elizabeth Tripodi. I'm with  
23    Levi & Korsinsky, LLP, and I'm here  
24    today representing plaintiff, and I  
25    agree.

1           With me today is my co-counsel

2           Kathy Ames also from my firm.

3           MR. GIBBS: Good morning. This is

4           Patrick Gibbs from Cooley representing

5           the defendants as well as Mr. Teller.

6           We also agree to the remote

7           format.

8           With me today are my colleagues

9           Bingxin Wu, and here from Tesla is

10           Candace Jackman.

11           THE VIDEOGRAPHER: This marks the

12           beginning of Video 1 of the Deposition

13           of Sam Teller in the matter of In Re:

14           Tesla, Inc. Securities Litigation.

15           Today's date is August 11. The

16           time on the video monitor is 9:09 a.m.

17           Will the court reporter please

18           swear in the witness.

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1 SAM TELLER,  
2 called as a witness, having been duly sworn by a  
3 Notary Public, was examined and testified as  
4 follows:

5 BY THE REPORTER:

6 Q Please state your full name and  
7 address for the record.

8 A Sam Teller, 1417 Kellam Avenue,  
9 Los Angeles, California 90026.

10 BY MS. TRIPODI:

11 Q Good morning, again, Mr. Teller.  
12 As I stated before, my name is Elizabeth  
13 Tripodi. I'm with the Law Firm Levi &  
14 Korsinsky, and I represent Plaintiff Glen  
15 Littleton in an action titled In Re: Tesla  
16 Securities Litigation.

17 The action is currently pending in  
18 the United States District Court for the  
19 Northern District of California.

20 Mr. Teller, where are you located  
21 for today's deposition?

22 A I'm in Roberts Creek, British  
23 Columbia in Canada.

24 Q Before we begin, I just want to go  
25 over some basic ground rules for the

**DEPOSITION TESTIMONY  
FILED UNDER SEAL**

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## C E R T I F I C A T E

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4 STATE OF NEW YORK )

5 ) ss. :

6 COUNTY OF NEW YORK )

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8                   I, THOMAS A. FERNICOLA, Registered  
9                   Reporter and Notary Public within and  
10                  for the State of New York, do hereby  
11                  certify that the within is a true and  
12                  accurate transcript of the proceedings  
13                  held on Wednesday, August 11, 2021.

14                   That I am not related to any of  
15                   the parties to this action by blood or  
16                   marriage; and that I am in no way  
17                   interested in the outcome of this  
18                   matter.

19 IN WITNESS WHEREOF, I have  
20 hereunto set my hand this 23rd day of  
21 August 2021.

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THOMAS A. FERNICOLA, RPR

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